

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GILEAD SCIENCES, INC., GILEAD SCIENCES IRELAND UC,
and GILEAD SCIENCES LLC ,

Plaintiffs,

-against-

SAFE CHAIN SOLUTIONS, LLC; PATRICK BOYD;
CHARLES BOYD; WORLDWIDE PHARMA SALES GROUP, INC.
d/b/a PHARMASALES.COM; ADAM S. BROSIUS;
BOULEVARD 9229 LLC; ISHBAY SHUKUROV; PETER KHAIM;
ZAFAR ABDULLAEV; PROPHARMA DISTRIBUTION LLC;
LEVI ELLIS; SYNERGY GROUP WHOLESALERS LLC;
CARLOS VEGA; ISLAND CHEMISTS INC.,
d/b/a MEADOW DRUGS & SURGICAL; RANDOLPH MOHABIR;
V.L.S. PHARMACY INC.; GOPESH M. PATEL;
LIN PHARMACY INC. d/b/a MAKKI PHARMACY;
SAMUEL YAKUBOV; MONICA A. NGO;
ASCENSION PHARMACY HOLDINGS 1 LLC
d/b/a MERMAID RX AND ARIEL PHARMACY; and
ALEX GELBINOVICH,

Defendants.
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ANSWER

21 Cv 4106 (AMD)(RER)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ SEP 17 2021 ★
BROOKLYN OFFICE

Defendant Peter Khaim , by and through his attorney, James R. Froccaro, Jr.,
as and for his Answer to the Complaint, alleges as follows:

1. Denies the allegations contained within paragraphs 1, 4, 9, 20, 21, 22, 37,
38, 39, 64, 88, 91, 92, 93, 110, 111, 113, 114, 115, 116, 133, 141, 142, 143, 144, 145,
146, 147, 148, and 149 of the Complaint, and respectfully refers any questions of law
to the Court.

2. Denies knowledge or information to form a belief as to the truth of the allegations contained within paragraphs 2, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 89, 90, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 112, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 134, 135, 136, 137, 138, 139, 140, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, and 176 of the Complaint.

3. Admits the allegations contained within paragraphs 19 of the Complaint.

ANSWERING THE FIRST CLAIM FOR RELIEF

4. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 177 of the Complaint.

5. Denies the allegations contained within paragraph 178 of the Complaint, and respectfully refers any question of law to the Court.

6. Denies the allegations contained within paragraph 179 of the Complaint.

7. Denies the allegations contained within paragraph 180 of the Complaint.

8. Denies the allegations contained within paragraph 181 of the Complaint.

9. Denies the allegations contained within paragraph 182 of the Complaint.

10. Denies the allegations contained within paragraph 183 of the Complaint.

ANSWERING THE SECOND CLAIM FOR RELIEF

11. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 184 of the Complaint.

12. Denies the allegations contained within paragraph 185 of the Complaint, and respectfully refers any question of law to the Court.

13. Denies the allegations contained within paragraph 186 of the Complaint.

14. Denies the allegations contained within paragraph 187 of the Complaint.

15. Denies the allegations contained within paragraph 188 of the Complaint.

16. Denies the allegations contained within paragraph 189 of the Complaint.

17. Denies the allegations contained within paragraph 190 of the Complaint.

18. Denies the allegations contained within paragraph 191 of the Complaint.

ANSWERING THE THIRD CLAIM FOR RELIEF

19. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 192 of the Complaint.

20. Denies the allegations contained within paragraph 193 of the Complaint, and respectfully refers any question of law to the Court.

21. Denies the allegations contained within paragraph 194 of the Complaint.

22. Denies the allegations contained within paragraph 195 of the Complaint.

23. Denies the allegations contained within paragraph 196 of the Complaint.

24. Denies the allegations contained within paragraph 197 of the Complaint.

25. Denies the allegations contained within paragraph 198 of the Complaint.

ANSWERING THE FOURTH CLAIM FOR RELIEF

26. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 199 of the Complaint.

27. Denies the allegations contained within paragraph 200 of the Complaint, and respectfully refers any question of law to the Court.

28. Denies the allegations contained within paragraph 201 of the Complaint.

29. Denies the allegations contained within paragraph 202 of the Complaint.

30. Denies the allegations contained within paragraph 203 of the Complaint.

31. Denies the allegations contained within paragraph 204 of the Complaint.

32. Denies the allegations contained within paragraph 205 of the Complaint.

33. Denies the allegations contained within paragraph 206 of the Complaint.

ANSWERING THE FIFTH CLAIM FOR RELIEF

34. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 207 of the Complaint.

35. Denies the allegations contained within paragraph 208 of the Complaint, and respectfully refers any question of law to the Court.

36. Denies the allegations contained within paragraph 209 of the Complaint.

37. Denies the allegations contained within paragraph 210 of the Complaint, and respectfully refers any question of law to the Court.

38. Denies the allegations contained within paragraph 211 of the Complaint.

39. Denies the allegations contained within paragraph 212 of the Complaint.

40. Denies the allegations contained within paragraph 213 of the Complaint.

41. Denies the allegations contained within paragraph 214 of the Complaint.

42. Denies the allegations contained within paragraph 215 of the Complaint.

ANSWERING THE SIXTH CLAIM FOR RELIEF

43. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 216 of the Complaint.

44. Denies the allegations contained within paragraph 217 of the Complaint, and respectfully refers any question of law to the Court.

45. Denies the allegations contained within paragraph 218 of the Complaint, and respectfully refers any question of law to the Court.

46. Denies the allegations contained within paragraph 219 of the Complaint.

47. Denies the allegations contained within paragraph 220 of the Complaint.

48. Denies the allegations contained within paragraph 221 of the Complaint.

ANSWERING THE SEVENTH CLAIM FOR RELIEF

49. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 222

of the Complaint.

50. Denies the allegations contained within paragraph 223 of the Complaint, and respectfully refers any question of law to the Court.

51. Denies the allegations contained within paragraph 224 of the Complaint.

52. Denies the allegations contained within paragraph 225 of the Complaint.

ANSWERING THE EIGHTH CLAIM FOR RELIEF

53. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 226 of the Complaint.

54. Denies the allegations contained within paragraph 227 of the Complaint, and respectfully refers any questions of law to the Court.

55. Denies the allegations contained within paragraph 228 of the Complaint.

56. Denies the allegations contained within paragraph 229 of the Complaint.

57. Denies the allegations contained within paragraph 230 of the Complaint.

ANSWERING THE NINTH CLAIM FOR RELIEF

58. Incorporates by reference the answers previously provided to paragraphs 1 through 176 of the Complaint with respect to the allegations made in paragraph 231 of the Complaint.

59. Denies the allegations contained within paragraph 232 of the Complaint, and respectfully refers any questions of law to the Court.

60. Denies the allegations contained within paragraph 233 of the Complaint.

WHEREFORE, defendant Peter Khaim demands judgment dismissing the
Complaint against him in its entirety with costs.

Dated: Port Washington, New York
September 12, 2021

Yours, etc.,

/JRF/

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